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6 || Attorneys for Defendants

UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF CALIFORNIA

10 PERDANA CAPITAL (LABUAN) INC., a) CASE NO. CV 09-01479 RS
11 Malaysian Corporation,)
12 Plaintiff,) Assigned to Hon. Richard Seeborg
13 v.)
14 MOHAMMAD AKRAM CHOWDRY, an)
Individual; HI-TECH VENTURE PARTNERS,)
15 LLC, a Delaware Limited Liability Company;)
HI-TECH ASSOCIATES, LLC, a California)
16 Limited Liability Company; and DOES 1-50,)
17 Defendants.)
18)
19)
20)
21)

1 IT IS HEREBY AGREED AND STIPULATED by the parties hereto, by and through
 2 their respective attorneys that are authorized to enter into this stipulation, that section 3, titled
 3 "EXPERT WITNESSES," of the Case Management Scheduling Order dated March 7, 2011 shall
 4 be amended as follows for the following reasons:

5 WHEREAS, on June 28, 2011, the parties filed a joint letter with Magistrate Judge Spero
 6 raising a number of issues related to discovery in this case;

7 WHEREAS, on July 25, 2011 Magistrate Judge Cousins signed the parties' Stipulation
 8 and Order Regarding Discovery Disputes ("Order") to resolve the issues raised in the June 28,
 9 2011 letter to Judge Spero;

10 WHEREAS, since the entry of the Order, the parties have been attempting to complete
 11 the discovery required under the Order;

12 WHEREAS, due to the delay in completing discovery the experts do not have all of the
 13 information they need to draft their respective expert opinions;

14 NOW, THEREFORE, IT IS HEREBY STIPULATED, AGREED AND
 15 RESPECTFULLY REQUESTED by the undersigned Parties, that section 3, titled "EXPERT
 16 WITNESSES," of the Case Management Scheduling Order dated March 7, 2011 shall be
 17 amended as follows:

18 3. EXPERT WITNESSES, The disclosure of expert witness opinions shall proceed
 19 as follows:

20 A. On or before January 10, 2012, plaintiff shall disclose expert testimony and
 21 reports in accordance with Federal Rule of Civil Procedure 26(a)(2).

22 B. On or before February 7, 2012, defendants shall disclose expert testimony and
 23 reports in accordance with Federal Rule of Civil Procedure 26(a)(2).

24 C. On or before March 20, 2012, all discovery of expert witnesses pursuant to
 25 Federal Rule of Civil Procedure 26(b)(4) shall be completed.

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1 **IT IS SO STIPULATED AND RESPECTFULLY REQUESTED.**

2 Dated: October 25, 2011

3 Respectfully submitted,

4 LAW OFFICES OF MICHAEL Q. EAGAN

5 By: _____ /s/
6 THOMAS H. MANULKIN

7 Attorneys for defendants Mohammad
8 Akram Chowdry, Hi-Tech Venture Partners,
9 LLC and Hi-Tech Associates, LLC

10 Dated: October 25, 2011

11 Respectfully submitted,

12 KAUFMAN DOLOWICH VOLUCK & GONZO

13 By: _____ /s/
14 JOSEPH KOURI
15 JOSEPH J. DE HOPE, JR.

16 Attorneys for plaintiff Perdana Capital
17 (Labaun), Inc.

18 I, Thomas H. Manulkin, of the Law Offices of Michael Q. Eagan, whose ID and
19 password are being used to file this Stipulation and [Proposed] Order, hereby, attest, in
20 accordance with General Order 45 X(B), that Joseph J. De Hope, Jr. of Kaufman Dolowich
21 Voluck and Gonzo, LLP has concurred in this filing.

22 Dated: October 25, 2011

23 Respectfully submitted,

24 LAW OFFICES OF MICHAEL Q. EAGAN

25 By: _____ /s/
26 THOMAS H. MANULKIN

27 Attorneys for defendants Mohammad
28 Akram Chowdry, Hi-Tech Venture Partners,
LLC and Hi-Tech Associates, LLC

1 PURSUANT TO STIPULATION, IT IS SO ORDERED

2 Dated: 10/25, 2011

3 UNITED STATES DISTRICT COURT
4 NORTHERN DISTRICT OF CALIFORNIA

5 
6 THE HON. RICHARD SEEBORG
7 UNITED STATES DISTRICT JUDGE

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